

EXHIBIT B

THOMAS SARANELLO

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN,	:	NO. 07CIV3769
Individually and on	:	
Behalf of All Other	:	
Persons Similarly	:	
Situated,	:	
Plaintiff	:	
	:	
vs.	:	
	:	
CITIGROUP, INC., and	:	
CITIGROUP TECHNOLOGY,	:	
INC.,	:	
Defendants	:	

DEPOSITION OF THOMAS G. SARANELLO

Taken in the Locks Law Firm, 110
East 55th Street, 12th Floor, New York, New York, on
Thursday, February 7, 2008, commencing at 11:30 a.m.
before Sally A. Slifer, CSR, Registered Merit
Reporter, Certified Realtime Reporter.

APPEARANCES:

LOCKS LAW FIRM

By: JANET C. WALSH, ESQ.

110 East 55th Street, 12th Floor

New York, NY 10022

-- For the Plaintiff

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APPEARANCES: (Continued)

MORGAN LEWIS

By: SARAH E. BOUCHARD, ESQ.

SARAH E. PONTOSKI, ESQ.

1701 Market Street

Philadelphia, PA 19103

-- For the Defendant

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1 A. Migrated to, ran out of space, closed the
2 data center down and moved everything over.

3 Q. When was that?

4 A. I believe the migration started as early
5 as '98 and finished up in 2000 sometime.

6 Q. What is a data center?

7 A. Data center is a central point of
8 communications, from what I understand. My
9 definition, it is a distribution for voice and data
10 services, houses file servers, network routers and
11 switches and circuits.

12 Q. Is it network support?

13 A. It is not considered support. It's pretty
14 much -- it's a service we provide. We do
15 installations for other departments and work with
16 multiple teams.

17 Q. When you say installations, could you go
18 through with me the specifics of what installations
19 you provide?

20 A. Taking a server request that's submitted by a
21 system administrator, working with the engineering,
22 network engineering teams on proper placement and
23 installation, configuration of network ports,
24 submission of network changes for those network ports.
25 That's a server installation pretty much.

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1 For network installations, we work
2 directly with either network engineering or network
3 integration; and work off a design provided, which we
4 QA the infrastructure portions.

5 Q. What did you say?

6 A. QA the design, work with engineering to make
7 sure their design is going to work in our environment.

8 Q. When you started as a team lead in
9 approximately 2000, how many people did you have
10 reporting to you?

11 A. I think it was five or six.

12 Q. Were you a vice president at the time --

13 A. No.

14 Q. -- or something else?

15 A. Eventually I was promoted to assistant vice
16 president, but I don't remember when.

17 Q. When you started you weren't?

18 A. No.

19 Q. What were the titles of the people reporting
20 to you?

21 A. Titles?

22 Q. Did they have a title?

23 A. Not that I remember, no.

24 Q. Prior to working as a team lead, did you have
25 another position with CTI?

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1 A. Yes.

2 Q. What was your position when you first started
3 to work there?

4 A. I don't recall. I was a technician, we were
5 techs.

6 Q. In what department did you work?

7 A. I worked for the same structure as I gave you
8 before, the -- under network integration, we were the
9 network infrastructure site support, whatever it was
10 called. I don't recall. We were called
11 infrastructure at the time. That's what it was before
12 we became NISS, which was under CGTI infrastructure.

13 Q. What did you do as a technician on a
14 day-to-day basis?

15 A. On a day-to-day basis I supported all moves,
16 adds and changes.

17 Q. Before we go any further, what does that
18 mean, if you could explain in layman's terms?

19 A. That means attending meetings for move
20 relocation.

21 Q. When you say a move relocation -- can you
22 explain what that is?

23 A. They are taking 25 people from one floor and
24 moving them to another floor. Our role is to insure
25 there's network capacity, availability of ports to

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1 house those users coming over, so we have to survey
2 the tech room to insure there's proper port capacity.

3 We would have to submit network
4 changes to configure those ports appropriately to
5 however those users are relocating as far as speed
6 duplex and VLAN goes.

7 If capacity was needed, we needed to
8 engage the network integration team to either supply
9 us with a line card for additional capacity, or if we
10 had one on our own, we would install it ourselves and
11 handle the configurations.

12 Then we handled the physical wiring
13 from the tech room out to the desktops, which would
14 include network testing, once all the wiring was
15 complete, and insure we established a session.

16 Q. I want to review this in more specific
17 detail. So if you had 25 people who were moving from
18 one floor to another floor, you said you would have to
19 determine the network capacity, is that correct?

20 A. (Witness nods head.)

21 Q. Explain what that means, how would you
22 determine network capacity?

23 A. If a switch, a network switch, had at that
24 time 24 port cards in it, and you were able to put in
25 up to 11 cards on that switch, so you would have 24

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1 A. Yes.

2 Q. Typically one person at a desk at that time,
3 how many ports would they be taking up?

4 A. Depending on the business they were, it would
5 be either one, two, or three, could be as much as four
6 if they were a technology business.

7 Q. One to four?

8 A. Yes.

9 Q. So you would go and you would look at the
10 Sisco switch, you would look at the number of ports,
11 you would make a count of how many ports were being
12 used, and you would record that information somewhere?

13 A. We go by our database. We take our database,
14 which is whatever it showed us, and we would match it
15 to the switch, and install conductivity where we
16 needed to, remove conductivity if needed. You are
17 managing capacity.

18 Q. And when you say managing capacity, explain
19 to me what you mean.

20 A. Managing capacity is having control of your
21 network switch and your capacity pretty much. It's --
22 if you had a business that was in a corner and they
23 took up fifty ports, and now you are moving a business
24 in that only needs one connection per your downsizing
25 to 25 ports, you are taking those ports back and now

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1 you have the additional capacity if anyone else moves
2 in.

3 It's pretty much being proactive so
4 that you don't always have to purchase a card.

5 Q. And when you say removing ports, you are
6 actually removing the piece of hardware?

7 A. Removing cables pretty much.

8 Q. Is a port a cable?

9 A. No.

10 Q. Or a cable connects to a port?

11 A. A cable connects to a port.

12 Q. So when you say removing ports, in addition
13 to removing the cable, are you actually removing
14 something else?

15 A. You are reclaiming ports. You are removing
16 cables.

17 Q. The port stays there?

18 A. Yes.

19 Q. The cable is removed?

20 A. Yes.

21 Q. So when you are moving people, presumably you
22 are taking away the conductivity, you are ending the
23 connectivity to the network?

24 A. Yes.

25 Q. That's the first step of it?

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1 A. Yes.

2 Q. In addition to actually taking out the
3 cables, what else is physically involved in removing
4 that connectivity?

5 A. Logically you need to shut down that port.
6 You are not supposed to have a port that has nothing
7 plugged into it. It's not supposed to be live. So
8 that port needs to be disabled. We would submit
9 network changes to make that happen.

10 Q. So essentially you have to shut down the
11 port, and you said you have to submit network changes
12 to do that?

13 A. Yes.

14 Q. What does that mean physically, how do you
15 submit a network change, who do you submit it to?

16 A. Physically it's called a layer two MAC
17 request that is sent to network control. At the time
18 we had access to switches prior to -- I don't remember
19 which year it was, but before the MAC requests, we
20 were able to shut down ports on our own pretty much.
21 We had privileges to logically telnet to a switch,
22 which means from a computer you could log into a
23 switch, look at the ports, and figure out what you
24 need to configure. We were able to do that.

25 Q. You were able to go onto a computer and turn

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1 off, through the computer, turn off the live feeds to
2 the port?

3 A. Yes.

4 Q. And that was -- you weren't allowed to do
5 that at some point?

6 A. At some point we were -- our write access was
7 taken away for compliance reasons, so the network
8 control group was the only group allowed to make the
9 changes going forward.

10 They set up a layer two MAC system
11 for us, which still meant we managed the capacity.
12 And we submitted the actual changes that the control
13 group had to make, pretty much typing up everything
14 for them, and then they would execute the change.

15 Q. You created some kind of spreadsheet or other
16 document, and you submitted either by e-mail or
17 physical piece of paper a request to that department?

18 A. No, it's an actual system. It was an actual
19 system, layer two MAC system.

20 Q. Does that mean you are going into a computer
21 and doing it on a computer?

22 A. Virtual, yes.

23 Q. So you go into the computer, you enter the
24 information, you make the request, it goes to somebody
25 else, and somebody else is actually in charge of

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1 switching off the live connection?

2 A. Yes.

3 Q. So essentially you are making the request,
4 whereas before you were actually switching off the
5 connection yourself?

6 A. Yes.

7 Q. You said the reason it was changed to that
8 system was for compliance --

9 A. Yes.

10 Q. -- issues?

11 A. Yes.

12 Q. Why was that?

13 A. I don't really know.

14 Q. Was that change implemented when you were
15 still a technician?

16 A. No. It was, I believe, around 2003.

17 Q. You were a team lead at that point?

18 A. Yes.

19 Q. So up to 2003, part of that process of what
20 we are going through here with moving was actually
21 disconnecting or turning off the live feed to the
22 port?

23 A. Yes, and also configurations of the port,
24 virtual LAN configurations to the port.

25 Q. Explain what you mean by that.

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1 A. Virtual LAN is attached to a network segment
2 where that segment can hold 255 devices on. We need
3 to make sure that we don't exceed that limit. And you
4 also need to understand how the VLAN works and how it
5 matches up to that address. So each network has a
6 virtual LAN number associated with it.

7 Q. What would you physically do with respect to
8 working out the configurations for the port, what was
9 physically involved?

10 MS. BOUCHARD: I am making a
11 standing objection. You have been using the word
12 physical a lot. Do you mean body motions, or do you
13 mean --

14 MS. WALSH: Yes. Physically did you
15 have to go and remove something, did you have to
16 create a document, did you have to put in a request,
17 physically what did you do?

18 A. Physically you would have to telnet to the
19 switch.

20 Q. What does that mean, how do you telnet to the
21 switch?

22 A. From a computer. Once you verify the port
23 you are going to be touching, you telnet to the
24 switch, establish a session from a computer, from a
25 telnet prompt. Then you would connect to that switch

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1 via IP address.

2 Q. What was the purpose of doing that?

3 A. To turn the port on or off and to change the
4 VLAN if necessary.

5 Q. Why would you have to change the VLAN?

6 A. If the other VLAN is full and if it has a
7 second VLAN on it, that's why the VLAN would need to
8 be changed.

9 Q. So you would have to determine if the VLAN
10 was full?

11 A. Yes.

12 Q. How would you do that?

13 A. By telnetting through the router to see how
14 many addresses are actually being used.

15 Q. Is there a number, is there a maximum
16 capacity that a VLAN has?

17 A. It depends on how the VLAN's are structured.

18 It's all -- it's the way it's designed from
19 engineering, whether it's 255 addresses, whether 125
20 addresses, it's laid out according to how the floor is
21 designed.

22 Q. Who determines that?

23 A. Network engineering.

24 Q. You don't have any input into that?

25 A. Absolutely we do.

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1 Q. What's your input?

2 A. If it's a new build-out. I don't want to get
3 away from a move. A move is 25 people going from here
4 to there, insuring capacity and making the
5 configuration changes you need, and add the additional
6 cabling.

7 If we are building out a new floor,
8 where we are adding new switches, we absolutely have
9 the input.

10 Q. What input do you have?

11 A. We work with engineering and pretty much give
12 them the amount of people that are going to be
13 occupying the floor, what type of business it is, to
14 determine the capacity.

15 Q. What impact does the type of business have on
16 determining the capacity?

17 A. If it's trading, it could be, you know, for
18 our five connections per desk. If it's back office,
19 it will be one.

20 Q. It's determining how many connections each
21 person would have to have potentially?

22 A. Yes.

23 Q. And communicating that to --

24 A. Depending on -- it's very important to
25 determine what you need to purchase, because the

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1 equipment is very expensive.

2 Q. So we talked about your input with -- I'm
3 sorry, what did you -- network engineering, right?

4 A. Yes.

5 Q. Your input to network engineering would be
6 able to communicate to them the number of people on
7 the floor, and the number of devices that each of
8 those people would have?

9 A. We would have input on it.

10 Q. Is that your input?

11 A. That's some of our input.

12 Q. Go through the rest of your input.

13 A. The other input is depending on what type of
14 network equipment is being purchased.

15 Q. What's your input with respect to that?

16 A. Whether our cable plant can handle what's
17 being ordered, the proper --

18 Q. Your cable plan or plant?

19 A. Plant. Pretty much determining the distance
20 between the end point router and where the local
21 switch is going to be placed.

22 That's something that engineering
23 cannot determine without us pretty much measuring and
24 putting a tester on that infrastructure and telling
25 them this distance is too great, you shouldn't be

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1 ordering this part, you should be ordering this part.

2 So that's part of our QA for a new
3 build of a network switch.

4 Q. To review that again, you would need to
5 determine the distance between the end point router?

6 A. Yes.

7 Q. What's the end point router?

8 A. That's where the switch connects to. That's
9 pretty much where the network starts.

10 Q. The end point router is the starting point
11 for the network?

12 A. Yes.

13 Q. You have to determine the distance between
14 the end point router and what else?

15 A. And the local switch, layer two switch.

16 Q. What is that?

17 A. That's the switch that's going in a tech room
18 to support the end users.

19 Q. That switch is in the tech room?

20 A. Yes.

21 Q. Where is the tech room, or where would it be
22 in relation to --

23 A. On a user floor.

24 Q. On a user floor?

25 A. Yes.

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1 Q. You referred to the microscanner, is that
2 something you physically connect?

3 A. Yes.

4 Q. Describe it for me.

5 A. It's a tester that goes through all the
6 parameters of a cable, whether it's good or not. It's
7 a cable tester that used to test network cabling.

8 Q. What do you actually hook it up to?

9 A. Cable, Ethernet cable or unshielded twisted
10 pair.

11 Q. Where is the cable, under the floor, behind
12 the walls, is it evident on the user floor, where is
13 it?

14 A. The cable is not a direct connection, so we
15 have to install interconnectivity between multiple
16 junctions.

17 Largely a tech room may, on a
18 drawing, may say this tech room connects to this data
19 center, but physically there could be multiple pieces
20 of cable that we have to tie together to get from one
21 point to another.

22 You need to have a good
23 understanding of cable plant to carry out those
24 interconnect.

25 Q. What is cable plant?

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1 A. Cable plant is premises wiring. It's a
2 combination of fiberoptic and copper cable wiring.

3 Q. Where did you develop your knowledge of cable
4 plant?

5 A. I started out in an assembly house when
6 network cabling was becoming very popular. So I have
7 an understanding of how to assemble cables and how to
8 get devices to talk to each other through multiple
9 types of media.

10 Q. When you started to work for Salomon Smith
11 Barney, was there a training program you went through
12 as a technician?

13 A. Training program, no.

14 Q. Did you receive any on-the-job training at
15 Salomon Smith Barney?

16 A. Yes.

17 Q. When was that?

18 A. Cable certifications that I gave you earlier.

19 Q. You took cable certifications while you
20 worked for Salomon Smith Barney?

21 A. Yes.

22 Q. Were they a requirement for your job?

23 A. I don't know.

24 Q. Were there technicians who worked with you
25 that didn't have those certifications --

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1 MS. PONTOSKI: Objection to the form
2 of the question.

3 Q. -- back when you started at Salomon Smith
4 Barney?

5 A. What was the question?

6 Q. Were there technicians working with you when
7 you got your certifications, were there technicians
8 working with you who didn't have their certifications?

9 A. I don't know.

10 Q. To get back to what you described as doing
11 the network testing to determine the appropriate
12 distance between the local switch and tech room, the
13 microscanner you actually connect to a cable, is it
14 one connection that determines it or multiple
15 connections to multiple cables?

16 A. You have to interconnect multiple cables.
17 You have to have an understanding of the cable plant
18 from how to go from one piece to another piece, make
19 sure, if it's an eight wire connection, all your wires
20 come out end to end the same way, so you can get an
21 accurate reading.

22 Q. Do you put the microscanner on each different
23 part of the cable, or you do all that connection first
24 and then you put the microscanner on to make sure it's
25 correct?

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1 A. Yes. It's got two pieces, one goes on one
2 end, one goes on the other.

3 Q. The first thing you do before doing the
4 microscanning, you have to make sure the cable plant
5 is correct?

6 A. Yes.

7 Q. To make sure that's correct, essentially you
8 need to insure that the correct pieces of cable are
9 connected in a correct manner to the next piece of
10 cable --

11 A. Yes.

12 Q. -- so on and so forth?

13 A. Yes.

14 Q. Are there plans you follow with respect to
15 this?

16 A. Plans?

17 Q. Yes.

18 A. No, just the knowledge of the building and a
19 knowledge of cabling infrastructure, understanding the
20 pairing, understanding 568-B and 568-A configurations,
21 basically understanding pin outs and wiring.

22 Q. What are pin outs?

23 A. A pin out is a configuration of a cable to
24 work with a certain technology, so an Ethernet
25 connection has a certain pin out. A token ring

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1 connection has a certain pin out. It's a wiring
2 schematic.

3 Q. Are there any books or manuals that explain
4 to you what the different pairings are or different
5 configurations are that you rely on at CTI?

6 MS. PONTOSKI: Objection to the form
7 of the question.

8 A. That we rely on, we have configurations in
9 our manual, but it is a requirement to understand the
10 wiring specifications and pin configurations as part
11 of being a technician.

12 Q. So if you are hired as a technician, it would
13 be expected you would already know what the wiring
14 configurations are?

15 A. Yes.

16 Q. I am going to get back to some of this, but I
17 want to move on to when you started to work with Mr.
18 Millan.

19 (Brief recess was had.)

20 Q. At some point Mr. Millan reported directly to
21 you?

22 A. Yes.

23 Q. When was that?

24 A. I believe it was 2001 through 2003.

25 Q. When he started to report to you, was he a

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1 A. At the very beginning, he was a technician.

2 Q. What were his duties and responsibilities as
3 a technician?

4 A. Same as I listed earlier.

5 Q. Could you go over them for me again, as you
6 listed with respect to what --

7 A. All the duties --

8 Q. -- that you had?

9 A. -- my group performed.

10 Q. Specifically I wanted to go over the duties
11 and responsibilities that he had as opposed to the
12 group that he had.

13 A. When you asked before I became a team lead
14 and what my duties were, it's those same duties.

15 Q. What about the rest of the technicians, they
16 all had the same duties?

17 A. Yes.

18 Q. Not just for your group --

19 A. I really can't speak for them, because I
20 don't know how they operated.

21 Q. How was work assigned to your specific group?

22 A. Work would be filtered down through me.

23 Q. Where did you -- who assigned work to you?

24 A. Project managers, engineers, integration,
25 system administrators.

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1 segments required for that server.

2 Q. Tell me what QA is, is it questions and
3 answers?

4 A. QA is reviewing what an engineer is giving
5 you. If an engineer tells you, you will put this box
6 in this cabinet and the network that's requested is in
7 a cabinet on the other side, you have to go back to
8 the engineer and say, you need to give me a cabinet in
9 this area, because the network segment is in this
10 room, not in this room.

11 Determining the cable system is too
12 great to go from one cabinet to where the network
13 switch is, submittal of network changes to insure the
14 ports are configured as per request.

15 Q. The TAS system is separate to the comtrack
16 system?

17 A. Yes.

18 Q. What I wanted to know, we will get back to
19 the TAS system, through the comtrack system of the
20 moves, adds or changes, move would be the most
21 significant of those three?

22 A. Yes.

23 Q. You just testified that aside from that
24 comtrack system, the TAS system was more significant
25 work or greater work --

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1 A. Yes.

2 Q. -- than what came through comtrack?

3 A. Yes.

4 Q. On a weekly basis, if you could break down
5 for your group, if you could give me an estimation of
6 percentage of time spent on TAS projects as compared
7 to comtrack projects as compared to GPMS projects as
8 compared to e-mails for network requests, those four
9 different things you testified where you got work
10 from; could you break down by percentage which was the
11 most significant?

12 MS. PONTOSKI: Objection to form of
13 the question.

14 A. Very hard to determine. I don't know, it's
15 very hard to determine that. The data center had
16 multiple requests weekly as well.

17 Q. Could you give me an average on a weekly
18 basis, I know you said 150 from comtrack?

19 A. Anywhere between 25 and 60 installs a week.

20 And coordinating a service install is a lot more
21 cumbersome than coordinating a move because of the
22 multiple departments that you need to work with.

23 You need to work with the
24 administrators to insure they deliver the equipment to
25 you properly, that they provide the necessary network

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1 information in the TAS system, and you need to work
2 with the engineering folks to insure that you have the
3 proper space.

4 You also need to work with critical
5 systems to insure that there's proper power and
6 cooling; that you are not exceeding any air
7 limitations or any power limitations.

8 Q. Critical systems is --

9 A. Power and cooling.

10 Q. How would you work with critical systems in
11 doing that?

12 A. If you get a request from an engineer that
13 says put it in this cabinet, and you already have
14 three or four devices in that cabinet, at times you
15 need to check with critical systems to insure you can
16 put a new box in there so that you don't blow a
17 cabinet or, you know, hurt the cooling in the area.

18 Q. So you would call somebody in critical
19 systems or communicate somehow?

20 A. Communicate by e-mail, whatever would work
21 with the critical systems folks.

22 Q. You would tell them there are X number of
23 unit or devices in this cabinet and we want to put in
24 another one, is that okay?

25 A. Yes.

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1 Q. They would tell you whether --

2 A. Yes.

3 Q. -- whether it would work or not?

4 A. Yes.

5 Q. You said 25 to 60 server install requests for
6 the data center a week. That's just through the TAS
7 system?

8 A. Yes.

9 Q. In terms of e-mails for network requests,
10 again, if you can give me an estimate per week as to
11 how many of those you would get?

12 A. It would depend on the time frame. If we
13 were upgrading a building where we were physically
14 taking the equipment out of a communication room and
15 putting in new equipment, I mean, to do forty floors
16 is a huge project, and you would be, you know, doing
17 several installs a week.

18 Q. Between 2001 and 2003, how many building
19 moves like that would you say occurred?

20 A. I don't know. But we did a lot of upgrades
21 to newer versions of Sisco chassis which involved lots
22 of weekend cut-overs, no down times allowed to the
23 businesses, so we would have to cut over after hours.

24 A lot of preparation work, creating
25 new databases for old or new devices going in and a

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1 A. Yes.

2 Q. -- when talking about the TAS system?

3 A. Working with engineering and critical systems
4 and system administrators, yes, that's a server
5 installation.

6 Q. What would be the first thing you would have
7 to do with respect to a server install?

8 A. QA the space portion, where it's going.

9 Q. When you say QA the space portion, what would
10 you specifically have to do with respect to working
11 out where it was going?

12 A. The steps I reviewed earlier; working with
13 critical systems, working with network engineering to
14 QA where they put it on the diagram.

15 MS. BOUCHARD: Does everyone know
16 for the record what QA is?

17 MS. WALSH: I asked him.

18 Q. You referred to a diagram. Who generated a
19 diagram and what did the diagram consist of?

20 A. Network engineering generated an acrobat PDF
21 file for us, which shows the cabinet layout and the
22 placement of the server.

23 Being we had multiple data centers
24 on the same floor, depending on the segment requested,
25 engineering may have placed it in the wrong room,

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1 wrong cabinet, wrong area. And that, in turn, is why
2 we QA the engineering portion of a server
3 installation.

4 Q. So you take the diagram you get from network
5 engineering, and you do what you say QA.

6 What does that actually involve?

7 A. Visiting the cabinet, understanding where
8 your network is, where the physical Sisco switches are
9 that house the network that the system administrator
10 is requesting, and insuring that it does not exceed
11 the Ethernet distance limitations.

12 Just because an engineer says it
13 goes in this cabinet doesn't mean it goes in that
14 cabinet because; A, it can either exceed the cooling
15 and power requirements of that cabinet; or B, not be
16 near the network segment that is requested; C, exceed
17 the cable distance limitations.

18 Q. They are the three things you could have a
19 problem with?

20 A. Yes.

21 Q. We talked about exceeding the cooling and
22 heating requirements not near the network segment.

23 What was the network segment?

24 A. Sisco switches that house the actual network
25 that those servers are going to be plugged into.

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1 Q. Not physically near it?

2 A. Not physically close enough.

3 Q. Was there a requirement it be a certain
4 distance?

5 A. 330 feet is the Ethernet distance limitation.

6 As I said earlier, we had three data centers on the
7 same floor, pretty big area, and if we were told to
8 put something in one room and the subnet segment was
9 in another room, it doesn't work.

10 Q. Why not?

11 A. Because of the distance, it exceeds the
12 distance limitations.

13 Q. It exceeds the 350 feet --

14 A. 330.

15 Q. 330 feet limitation. Okay.

16 Is that actually, say, as the crow
17 flies, or is that cable distance, the length of cable?

18 A. It is the cable distance and the network
19 dependency. The network will be latent. It won't
20 properly function if you exceed those distance
21 limitations.

22 Q. I am trying to figure out, when you are
23 determining the 330 feet, is it a straight measurement
24 in terms of as the crow flies, or is it a measurement
25 as it goes through cables, turns, and bends?

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1 A. It's a measurement with a cable tester,
2 microtest. Once you install your interconnects
3 between that switch that's connected and the server
4 cabinet, that's where you determine your distance.

5 Q. So the microscanner tells you the distance?

6 A. Yes. End to end.

7 Q. You don't go out and measure it?

8 A. With a stick, no. You install your
9 interconnects from your switch to your server. Then
10 the cable hangs on either side; you put one end of
11 your tester on one end, the smart end on the other
12 end, and you run your cable test to insure they pass.

13 Q. Do you have to set the microscanner?

14 A. Yes.

15 Q. Is there a setting mechanism?

16 A. Yes.

17 Q. How do you do that?

18 A. Through menus on the tester.

19 Q. What types of information go into determining
20 how you set it?

21 A. Distance parameters, capacity, loop
22 resistance, impedance.

23 Q. Go through those a little slower. Start
24 again, distance parameters?

25 A. Distance parameters, capacity, loop

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1 resistance, near and cross talk.

2 Q. Near and cross talk?

3 A. Yes.

4 Q. Anything else?

5 A. There are a few more, but these are the
6 critical ones, these are the ones we pay attention to.
7 Near and cross talk is how pairs interfere with each
8 other electrically.

9 Q. Pairs of what?

10 A. Of wire. So if our cables, which are four
11 pair cables, eight wire cables, the pairs that are
12 twisted cannot interfere with the other pairs. As you
13 exceed distances, they tend to interfere and you get
14 failures.

15 Q. Capacity, you are talking about port
16 capacity?

17 A. No.

18 Q. What capacity?

19 A. Capacity -- I don't know the definition of
20 capacity, but it's another parameter that's tested on
21 cabling. I don't know if it's the ohms -- no, the
22 impedance is the ohms of the cable to insure it's a
23 hundred ohm or 75 ohm.

24 Capacitance is a test that pretty
25 much tests the tunnel from end to end to make sure

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1 that you have the capacitance for that signal to pass
2 through. That's my definition of capacitance. I
3 don't know the exact way to define it.

4 Q. Distance parameters, is that what we already
5 discussed?

6 A. The 330 feet.

7 Q. Did you have a system whereby you assigned
8 work to the five to six people that reported to you?

9 A. Yes, I used every system that we had to
10 re-assign a MAC, basically put the MAC under the
11 technician's name, send them an e-mail to let them
12 know that this ticket has been placed under your name,
13 please proceed.

14 Q. Did you always re-assign the tasks, or did
15 you do any of them yourself?

16 A. I did some myself as well, but I did
17 re-assign most of them.

18 Q. Any particular reason you would keep specific
19 tasks to do yourself?

20 A. No, just to help with the workload.

21 Q. It wasn't that you kept more difficult ones
22 and assigned easier ones?

23 A. No.

24 Q. So if they were particularly busy, you might
25 chip in?

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1 How would a technician -- at the
2 time, how did a technician provide cabling
3 documentation?

4 A. When you install conductivity, you need to
5 follow up and document it and put it into a shared
6 database.

7 Q. How do you do that?

8 A. Open up the file and put your information
9 across.

10 Q. So you physically type in the information?

11 A. Yes.

12 Q. Into something like an Excel spreadsheet?

13 A. Excel or Access.

14 Q. What information are you actually putting in
15 there?

16 A. Depending if it's a server installation, you
17 are putting in all the interconnects that are from the
18 switch back to the server. If it's a desktop
19 installation, you are putting your interconnects from
20 the desktop to the switch.

21 When you are installing fiberoptic
22 interconnects, same concept, putting your interconnect
23 information. When you are installing T 1 circuits,
24 ISDN circuits, POTS circuits, you are entering the
25 cable path.

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1 Q. What is the interconnect information?

2 A. Cross connect database, cable path from one
3 point to another point.

4 Q. Is it a number, something else, how do you
5 track what the -- what are you actually typing in when
6 you put in the interconnect information?

7 A. Panel number with the port number.

8 Q. Where do you get that from?

9 A. From the tech room that it's in.

10 Q. So in the tech room, are you looking at the
11 specific device; what are you looking at to get this
12 information?

13 A. Patch panel, switch port.

14 Q. It's usually a series of numbers, letters
15 maybe?

16 A. Yes.

17 Q. The purpose of that is what?

18 A. To insure your environment is documented.

19 Q. Why is that?

20 A. For trouble shooting purposes, just overall
21 best practices to keep documentation of your
22 infrastructure.

23 Q. With respect to T 1 lines, what did you say
24 was the information you had to put in?

25 A. Same, depending on where you -- where a T 1

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1 reported to you, change over the course of time?

2 A. Yes.

3 Q. How did they change?

4 A. He became a key person for compliance.

5 Q. Let's deal with that before we move on.

6 Explain how he became a key person
7 for compliance?

8 A. He helped build the continuity of business
9 plan, the process and control manual as well, he had a
10 lot of input into that, attended meetings for, you
11 know, compliance, handled most of the deliverables for
12 anything required by compliance offices.

13 Q. You said he helped build the continuity of
14 business plan. Let's start with that.

15 What is the continuity of business
16 plan?

17 A. It's a disaster recovery plan for emergency
18 situations, a document that dictates evacuation plans
19 and contact information, what to do during certain
20 situations.

21 Q. Was the continue -- the COP, right?

22 A. B.

23 Q. Sorry. Was the COB created just for your
24 department?

25 A. No.

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1 Q. Was there a COB for the entire company?

2 A. I believe everyone had to create a COB.

3 Q. Each different department had their own COB
4 plan?

5 A. I believe so.

6 Q. And did your group have its own COB plan?

7 A. Yes.

8 Q. And the one that Mr. Millan created was for
9 your specific group?

10 A. Yes.

11 Q. And that was your group, meaning you as team
12 leader plus your six people, or a wider group than
13 that?

14 A. I believe it was -- also encompassed Rick
15 Braunagel as well. I believe the manual -- the COB
16 and the manual was for both Rick Braunagel and myself
17 under Garfield Spence.

18 Q. Did a directive come from somebody to create
19 a COB plan?

20 A. Senior management. I don't know --

21 Q. How did you get the directive, or did you get
22 the directive?

23 A. From Garfield.

24 Q. When was it that Garfield Spence communicated
25 to you there was a need to integrate a COB plan?

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1 A. I don't recall that.

2 Q. Was it around September 11th, 2001?

3 A. It was probably after that time.

4 Q. Was that the impetus for the creation of it?

5 A. I think so. I believe so.

6 Q. What did Garfield Spence tell you in terms of
7 integration of a COB plan, what was required?

8 A. It was collaborative between Gary and the
9 compliance offices.

10 Q. Who is Gary?

11 A. Garfield Spence.

12 Q. That's his nickname?

13 A. (Witness nods head.)

14 Q. Were you given any materials or documentation
15 to explain what was required to create the COB plan?

16 A. Yes.

17 Q. What were you given?

18 A. I don't recall what it was.

19 Q. Did it have information contained in there as
20 to what was required?

21 A. Yes. Again, Carmelo worked pretty much
22 directly with the compliance offices to get it done.

23 When I got a request to add
24 something or remove something, we spoke about it or I
25 e-mailed him to input something new into the COB plan

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1 or manual, but pretty much worked directly with the
2 compliance offices in getting all deliverables
3 completed.

4 Q. When you say the compliance offices, what
5 department is that?

6 A. Compliance.

7 Q. So there's a separate department called
8 compliance?

9 A. Yes.

10 Q. Was that for the entire CTI or for your group
11 specifically --

12 A. Entire CTI.

13 Q. So who determined Mr. Millan was going to be
14 assigned to do that?

15 A. Me.

16 Q. Did you provide him with the documents Mr.
17 Spence gave to you in connection with that?

18 A. Early on we collaborated on it, but he pretty
19 much built it with compliance.

20 Q. Was Rich Braunagel involved in that at all?

21 A. I don't recall if he was. I know he was
22 involved with the manual, but I don't recall about the
23 compliance, the COB plan.

24 Q. What information was in the COB plan?

25 MS. BOUCHARD: Other than what he

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1 testified to?

2 MS. WALSH: Yes. He said what the
3 purpose of it was.

4 Q. I want to know what information was actually
5 in there. I don't have it.

6 A. Evacuation procedures, contact lists. That's
7 really all I can think of, off the top of my head.

8 Q. In addition to evacuation procedures and
9 contact lists, was there other information but you
10 just don't recall right now?

11 A. I just don't recall. Application testing
12 procedures, there are tests you need to conduct in
13 order to insure your unit will function in the event
14 of a disaster. There's COB testing involved with
15 that.

16 Q. Was there a template or master COB plan
17 distributed to assist in the process?

18 A. I don't know.

19 Q. Did you make any efforts to find that out?

20 A. I don't remember that far back, whether we
21 received a template or if it was created from scratch.

22 Q. Did you make efforts to find that out for
23 today?

24 A. No.

25 Q. When you say -- you testified you originally

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1 collaborated with Mr. Millan with respect to the
2 creation of the COB.

3 What did you do specifically in that
4 regard?

5 A. I pretty much gave -- I don't really recall
6 exactly what I did, but I know I got him engaged early
7 on to work with compliance to get it built. So
8 compliance asked me. I guess they asked Gary, and
9 Gary asked me, and I said have them work with Carmelo.
10 That was the collaboration, he was the key person for
11 it.

12 If he needed -- if Carmelo needed
13 information, he would come to me, say, Tom, I am
14 updating, you know -- building this portion of it, I
15 need this information from you, and I would provide
16 it.

17 Q. How would he find out what information needed
18 to go into it?

19 A. Work with compliance.

20 Q. Did he get that information from compliance?

21 A. Yes.

22 Q. And then he compiled the information into the
23 COB?

24 A. Yes.

25 Q. If he needed to know information that he

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1 A. You can refer to it if you need to look
2 through it.

3 Q. Do you give it to a new technicians when they
4 start to work with you?

5 A. Yes.

6 Q. Did you give a copy of the existing PCM to
7 Mr. Millan when he started to work with you?

8 A. I don't recall.

9 Q. Is it your practice to give it to new
10 technicians when they start to work with you?

11 A. Yes.

12 Q. Was it used for any other purposes than the
13 ones we have just gone through?

14 A. Not that I know of.

15 Q. In terms of updates, at some point in time
16 Mr. Millan took on responsibility for updating the
17 PCM. Who assigned him that task?

18 A. Me.

19 Q. When was that?

20 A. I don't recall.

21 Q. Was there a reason you decided to assign it
22 to him?

23 A. Yes.

24 Q. Why?

25 A. Because compliance was a little too much for

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1 request from compliance?

2 A. Yes. If somebody's name changed, phone
3 number changed, processes changed, we would take it
4 upon ourselves without compliance.

5 Q. While Mr. Millan had the responsibility to
6 update the PCM and make the changes, did he also
7 continue to do his other duties and responsibilities?

8 A. Yes.

9 Q. While Mr. Millan reported to you, he didn't
10 supervise any other employees, did he?

11 A. No.

12 Q. He didn't have the ability to hire employees,
13 did he?

14 A. No.

15 Q. Did he have the ability to fire employees?

16 A. No.

17 Q. Was he in any way related with managing
18 employees, other employees?

19 A. No.

20 Q. Did he have any management responsibilities?

21 MS. PONTOSKI: Objection to the form
22 of the question.

23 A. It depends on what you consider management.
24 If you consider tasking a project to him and letting
25 him handle it himself, he's managing it. He doesn't

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1 come to you every step of the way he is managing a
2 project. So he definitely did manage on his own
3 pretty well when a task was given to him. He attended
4 meetings..

5 Q. We discussed the COB plan, process and
6 control manual, and another area you testified to that
7 Mr. Millan assumed responsibility for was attending
8 meetings for compliance.

9 I just want to get again an
10 explanation as to what that entailed?

11 A. Meetings regarding changes to compliance
12 activities.

13 Q. Was that to do with the PCM or COB or
14 something different?

15 A. Yes. Or risk and control, self-assessments
16 he handled as well, which is questions pertaining to
17 each process that we as a group had to enter for
18 compliance, and that's a role he handled.

19 Q. So compliance would present questions to you
20 with respect to processes?

21 A. Compliance would say, here is the problem
22 management risk and control self-assessment. You need
23 to complete it by such and such a date. You need to
24 answer all questions, you need to provide all
25 evidence.

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1 Q. How often were you given a project management
2 risk and control self-assessment?

3 A. It could have been early on. I don't know if
4 it was quarterly. I don't know if it was semiannually
5 or annually, but he was handling them.

6 Q. It could have been annually, it could have
7 been quarterly --

8 A. It changed.

9 Q. -- semiannually?

10 Did it get more frequent or less
11 frequent over the time he reported to you?

12 A. It changes. It could be first quarter we
13 would be doing change management and problem
14 management. Second quarter would be vendor
15 management. I can't be specific when we conducted
16 them, because they changed so frequently.

17 Q. Did you attend those meetings?

18 A. Several, but not -- I wasn't on every single
19 one of them, because he was taking care of that
20 function.

21 Q. Now, what efforts did you make to determine
22 how often the project management risk and control
23 self-assessment was given?

24 A. We took guidance from compliance.

25 Q. For your deposition today did you make any

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1 efforts to determine how often the project management
2 risk and control self-assessment was issued?

3 A. Problem management.

4 Q. Sorry.

5 A. I made no efforts.

6 Q. How often, say over the course of the time
7 that Mr. Millan was reporting to you, how often were
8 their meetings that related to compliance issues?

9 A. I don't know.

10 Q. Did you make any efforts before your
11 deposition to find out that information?

12 A. No.

13 Q. Would there have been more than one a year?

14 A. Yes.

15 Q. Would there be more than one a month?

16 A. I don't know. I would say at least one a
17 month.

18 Q. Now, you said that they would actually
19 issue -- was this a paper document, the problem
20 management risk and control self-assessment?

21 A. Yes, paper and electronic.

22 Q. Different ones dealt with different aspects
23 of the processes within your department?

24 A. Yes, whatever pertained to our department we
25 had to complete a self-assessment form, and compliance

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1 that has Bates stamped CTI 000326 through 329. And I
2 am going to give you a moment to review that document.

3 Do you recognize Exhibit 3?

4 A. Yes.

5 Q. What is it?

6 A. 2002 year end performance review for Carmelo
7 Millan.

8 Q. Did you create this performance review?

9 A. Yes.

10 Q. With respect to section two, assessment of
11 job related factors, is it correct with respect to all
12 but one of those categories, you marked him as a
13 consistent performer?

14 A. Yes.

15 Q. And in one of those categories, job
16 proficiency, knowledge, you marked him as a top --
17 strong performer?

18 A. Yes.

19 Q. You didn't mark him as a top performer with
20 respect to any of the categories, is that correct?

21 A. Yes.

22 Q. With respect to section three on the second
23 page, assessment of managerial factors, written in
24 there is not applicable?

25 A. Yes.

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1 A. Yes.

2 Q. Just explain -- this also refers to a human
3 resources restack.

4 Could you tell me what a restack is?

5 A. It was a move of 141 people.

6 Q. What is a restack, is that what it is, a
7 move?

8 A. Basically a business coming together
9 somewhere, because they are scattered maybe.

10 Q. It's a different term than a regular move?

11 A. Restack, relocation, move, they are all kind
12 of --

13 Q. Interchangeable?

14 A. Yes.

15 Q. When you say he was the lead technician, what
16 does that mean?

17 A. He ran with that project with little or no
18 direction from management.

19 Q. Was there a particular site Mr. Millan was
20 assigned to more than any other site when he reported
21 to you?

22 A. 388 Greenwich Street and the 390 data center
23 when he did work in there. 333 West 34th Street at
24 times as well.

25 Q. Was there a lab facility or something

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1 A. Just whenever he needed connectivity extended
2 to that extent. We had personal e-mails, sure, how
3 are you doing, how are things. He was a good worker.
4 I treat him like anybody else that respected me. And
5 he always respected me.

6 (Saranello Deposition Exhibit Number
7 4 was marked for identification.)

8 Q. For identification purposes what has been
9 marked as Saranello 4 is a four-page document Bates
10 stamped CTI 0000330 through 333.

11 A. Pretty nice review, I would say.

12 Q. You are a nice boss.

13 A. I hope he told you the same thing.

14 (Discussion held off the record.)

15 Q. Can you identify this document?

16 A. Yes.

17 Q. What is it?

18 A. Carmelo Millan's 2003 year end performance
19 review.

20 Q. And did you prepare this?

21 A. Yes.

22 Q. And at the time you were an assistant vice
23 president?

24 A. Yes.

25 Q. If you turn to page three of the document on

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1 A. Off the top of my head, I can't answer that.

2 I am sure he did.

3 Q. Did any other technicians who reported to you
4 undergo any training?

5 A. Yes, training is available.

6 Q. At the time Mr. Millan reported to you, what
7 type of training was available for him to take?

8 A. Training is available on a large scale. You
9 can take whatever training you are interested in.

10 Q. Is it required?

11 A. No. There are some mandatory human resource
12 training courses.

13 Q. Were there any certifications required to do
14 the job of a technician?

15 A. I would look for people with networking
16 backgrounds and cabling certifications for
17 infrastructure. ICND was something that I
18 recommended, interconnecting Sisco network devices.

19 Q. Did all of the technicians who work for you
20 have ICND certification?

21 A. Most.

22 Q. Some didn't?

23 A. Off the top of my head, I don't know if
24 anyone doesn't go.

25 Q. Was it required for the job?

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1 Q. Did he ever get a raise when he reported to
2 you?

3 A. Yes.

4 Q. Do you know what raise he got when he
5 reported to you?

6 A. Last year I believe it was like 18 percent
7 increase. I don't know how much it was.

8 Q. Where did you get that information from?

9 A. From Garfield Spence. Garfield handed it to
10 us to give out.

11 Q. What was the reason Mr. Millan got an 18
12 percent increase?

13 Which year was that, by the way?

14 A. 2003. You can tell by his review.

15 Q. Was it based on his review?

16 A. I would think so, yes.

17 Q. But you don't know?

18 A. I put the review in, and Gary assumed --
19 handled the money.

20 Q. Mr. Millan never did computer programming
21 when he reported to you, did he?

22 A. Not that I am aware of.

23 Q. He wasn't a software engineer, was he?

24 A. Not that I know of.

25 Q. He wasn't working for you as a software

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1 EXAMINATION

2 BY MS. BOUCHARD:

3 Q. I have a few questions for you.

4 Did you ever talk to Gary about
5 having him consider giving Mr. Millan more money based
6 on the work he was doing for you in 2003?

7 A. Yes.

8 Q. And can you just explain what you remember
9 telling him?

10 A. Basically everything in his review, he went
11 above and beyond in a lot of areas. He helped with
12 the compliance duties. He was network savvy. He
13 helped with any network issues that arose, you know.
14 He probably would be the first guy to contact from my
15 team to get involved in something that was technical.

16 Q. Did anyone else on your team get an 18
17 percent bonus?

18 MS. WALSH: Raise.

19 MS. BOUCHARD: Raise. Thanks.

20 A. No.

21 Q. Now, what would happen if a person on your
22 team made a mistake and did not establish connectivity
23 in the correct way, what would be the consequences to
24 the business?

25 A. It would be critical to the business.

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1 Q. Can you give me some examples of what could
2 happen?

3 A. If you go into a data center and you put a
4 device on the network and you don't know what you are
5 doing, you could get a duplicate IP -- you could
6 duplicate an IP address on a device and it could take
7 a production device down, so you need to understand
8 what you are doing before you put anything on the
9 network.

10 Q. Could it impact a trader or trader's
11 abilities to transact business on the trading floor?

12 A. Yes.

13 Q. Did you instruct your team about the
14 consequences of their actions?

15 A. Yes.

16 Q. Because the consequences could be so high,
17 how does that relate to documentation?

18 MS. WALSH: Objection to the form.

19 A. Documentation is critical.

20 Q. Can you explain why?

21 A. Because within the data center you have
22 multiple paths on one connection, multiple
23 interconnect points, and as you build a room and a
24 data center, as it grows your cable and infrastructure
25 gets very, very packed, packed meaning big, bundles of

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1 cable.

2 If you don't have documentation and
3 something does break, you know, you are going to be
4 driving yourself crazy to find that connection. If
5 you have it, if you have the database in front of you,
6 you can run to the end points and pretty much match up
7 the cable ID's that are on, and that will help you
8 troubleshoot the link much quicker than if you didn't
9 have documentation.

10 MS. BOUCHARD: I think that's it.

11 * * *

12 RE-EXAMINATION

13 MS. WALSH:

14 Q. One follow-up question. You said that nobody
15 else in the group got as high a raise as Mr. Millan in
16 2003.

17 Do you know what raises the other
18 technicians got in the group, if anything?

19 A. I don't think anything was higher than 18.

20 Q. Do you know what the others got?

21 A. Off the top of my head, no, I don't.

22 Q. Did you make any efforts to find that out?

23 A. No.

24 * * *

25 RE-EXAMINATION

DEPOSITION EXHIBIT 3



3

Technology 2002 Year-End Performance Review

Name (Last, First, MI) Millan, Carmelo	Job Title Analyst	Social Security #
Organizational Name/Project Team: Network Integration Services / Infrastructure Group		Review Period From: 1/1/02 To: 12/31/02
Reviewer Name/Job Title Tom Saracillo / AVP		

Ratings Key

REDACTED

- (1) Top Performer - Exceptional performance; role model for others in the group
- (2) Strong Performer - High performance; one of the stronger performers in the group
- (3) Consistent Performer - Consistent performance; responds to coaching and direction.
- (4) Inconsistent Performer - Average to below average performance; performance is below the group average
- (5) Under Performer - Below average performance; must improve significantly to retain position; performance is at the lowest level of the group

Section 1 - Key job responsibilities:

1. Facilitate all network related issues at 388 Greenwich Street.
2. Facilitate and maintain all day to day network requests to include MAC's, CSR's, GPMS trouble tickets and database management.
3. SOE network implementation and support.

Section 2 - Assessment of job-related factors:

	Top Performer	Strong Performer	Consistent Performer	Inconsistent Performer	Under Performer
Job proficiency/knowledge	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo has a good understanding of networking and infrastructure. His knowledge brings value to the group when network issues arise.				
Quality of work	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo has shown improvement in quality by getting more involved in data center installations.				
Productivity/efficiency	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo accepts projects and completes them in a timely manner. Also, his projects are completed without any issues and with very limited guidance from management.				
SILC compliance/testing	N/A				
Supporting comments	N/A				
Teamwork/interpersonal skills	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo has displayed good teamworking skills by assisting others with MAC's and trouble tickets.				
Service	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo has shown improvement in customer service by following up on tasks assigned.				
Initiative	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo has taken the initiative to assist others in the 390 Data Center 4 build out and the Long Island City SOE conversion.				
Communication	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting comments	Carmelo has always communicated properly with others and management. I have received positive feedback from peers and customers regarding his assistance.				

CTI0000326

Section 3 – Assessment of Managerial Factors (if applicable):

	Top Performer	Strong Performer	Consistent Performer	Inconsistent Performer	Under Performer
FINANCIALS					
Job Actual vs. Forecast	N/A	N/A	N/A	N/A	N/A
Cost Per FTE	N/A	N/A	N/A	N/A	N/A
Recruiting (Cost per hire)	N/A	N/A	N/A	N/A	N/A
Expense Management Initiative	N/A	N/A	N/A	N/A	N/A
PEOPLE				N/A	N/A
Turnover	N/A	N/A	N/A	N/A	N/A
Internal Mobility	N/A	N/A	N/A	N/A	N/A
Staff Development/Training	N/A	N/A	N/A	N/A	N/A
Staff Morale	N/A	N/A	N/A	N/A	N/A
PROJECT DELIVERY					
Completion on Time	N/A	N/A	N/A	N/A	N/A
Completion on Budget	N/A	N/A	N/A	N/A	N/A
Project Impact (Revenue/Cost Returns)	N/A	N/A	N/A	N/A	N/A
CUSTOMER SATISFACTION					
Survey Results	N/A	N/A	N/A	N/A	N/A
CONTROLS					
Major Business Issues	N/A	N/A	N/A	N/A	N/A
Business Issues	N/A	N/A	N/A	N/A	N/A
Project Issues	N/A	N/A	N/A	N/A	N/A
WELLNESS/OUTAGES					
Production Support Costs	N/A	N/A	N/A	N/A	N/A
Production Problems	N/A	N/A	N/A	N/A	N/A
Production Assessment	N/A	N/A	N/A	N/A	N/A

OVERALL PERFORMANCE ASSESSMENT 1/1/02 TO 12/31/02

	Top Performer	Strong Performer	Consistent Performer	Inconsistent Performer	Under Performer
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

OVERALL PERFORMANCE SUMMARY FOR 1/1/02 TO 12/31/02:

Carmelo has played a major role in various large scale moves throughout the year. He was the lead technician in the Human Resources Restack which involved the relocation of 141 users from various metro sites to 388 Greenwich Street. He was also the lead technician in the Stock Plan Services, E-Business and General Services Restacks. Carmelo has also assisted in larger scale projects such as the Long Island City SOE Conversion and 390 Distributed Data Center 4 buildout. He has completed a total of 859 Comtrack tasks for the year and is currently assisting in the 388 Greenwich Street Network Security Directive.

PRIMARY AREAS FOR IMPROVEMENT/SKILL ENHANCEMENT:

I would like to see Carmelo continue to assist data center buildouts and remote SOE conversions. I would like to see him continue to support daily MAC's and Trouble Tickets at 388 Greenwich Street and provide assistance in Communication Room maintenance.

APPRAISEE'S COMMENTS:

Employee Signature and Date: _____

(Signature acknowledges that a discussion of this document has taken place, but does not indicate that I necessarily agree with this appraisal of my performance.)

Manager Signature and Date: _____

Next Level Management and Date: _____

Description of job factors:

Job proficiency/Knowledge: Technical knowledge and ability is commensurate with job title and level of experience. Applies technical skills to the job. Understands technical environment and businesses supported.

Quality of work: Work is thorough, accurate, and complete. Develops appropriate test plans and executes them successfully. Adheres to standards, high level of client satisfaction.

Productivity/efficiency: Produces required amount of work within planned timeframes.... meets deadlines. Uses corporate resources effectively. Utilizes appropriate tools. Leverages existing assets.

Teamwork/interpersonal skills: Successfully works with others to achieve goals. Shares information. Maintains positive working relationships. Lends support and assistance readily.

Service: Responsive to client needs and those of others in the firm. Involves other in improving processes. Participates as a partner.

Initiative: Takes action beyond requirements. Anticipated and addresses issues directly. Resourceful. Self-starting.

SILC: Understands and adheres to SILC policy and good practices.

Communication: Expresses thoughts logically, clearly, and concisely. Listens well and respond appropriately.

DEPOSITION EXHIBIT 5

5

Saranello, Thomas G [CCC-OT_IT]

From: Saranello, Thomas G [IT]
Sent: Tuesday, September 09, 2003 6:17 PM
To: Millan, Carmelo [IT]
Subject: RE: The COB Plan and Facilities TRAM
Attachments: Ins Ques_14Wall.doc; Ins Ques_34th.doc; Ins Ques_388.doc; Ins Ques_AMEX.doc; Ins Ques_BAT.doc; Ins Ques_JSQ.doc; Ins Ques_NYSE.doc; Insurance14Wall.xls; Insurance34th.xls; Insurance388.xls; InsuranceAMEX.xls; InsuranceAMEX.xls; InsuranceBAT.xls; InsuranceJSQ.xls; InsuranceNYSE.xls

Regards,
Tom Saranello

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-----Original Message-----

From: Millan, Carmelo [IT]
Sent: Tuesday, September 09, 2003 3:53 PM
To: Spence, Garfield C [IT]
Cc: Saranello, Thomas G [IT]; Braunagel, Richard J [IT]
Subject: The COB Plan and Facilities TRAM

Garry, the COB Plan is basically finished. I'm just waiting on two or three phone numbers before I can send out a final copy to you, Tommy, and Rick. Once you guys approve it we should send out a copy to all the staff and schedule a meeting for next Thursday. I need the rest of this week to finish the Facility Tram.

As far as the Facility TRAM (due date 9/15) is concerned we really only have a few major issues.

I need to know whether you or the business control access to the closets at the BAT. The cipherlocks are a big issue when it comes to compliance and I'm trying to figure out how to proceed on this.

We need to get an e-mail from Jim Carney stating that the 34th Street data center is above a sub-basement and is too expensive to relocate. Patti also mentioned there might be a similar issue with 250 West.

The Insurance Questionnaire needs to be filled out by Rick and Tommy again this year.

I need to do a walk-through of all the sites.

And finally, we need to discuss the possibility of bringing the voice guys over to the Tel-Key process for the sites you do own, which would probably require having all the locks re-keyed.

Thank you,

Carmelo Millan

Citigroup Technology Infrastructure
Network Integration Services
Office: (212) 816-1506
Pager: (917) 820-4994

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Tracking:

Recipient

Milan, Carmelo [IT]

Read

Read: 9/9/2003 6:17 PM

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